Section E-3, general comments

Clarification is needed on the baseline concentrations used for the EIS. It is unclear if the maximum potential baseline emissions or average baseline emissions were used to determine INEEL's environmental impact with the AMWTP.

The AMWTP has been designed to meet the proposed MACT standards for waste incineration. The only problem may be with mercury (Hg) emissions. If waste with a 1% (or higher) Hg content is treated at the maximum rate possible, stack concentrations would exceed the proposed MACT standard for Hg. This should be noted and considered as the basis for a permit limitation.

Table E-3-1, Page E-3-8

Note b is confusing. Reviewers could not tell if the stack concentrations in the table had been corrected to 7% oxygen or if they had been reported at 14% oxygen.

Section E.3.3.2.1, page E-3-17

All radionuclide doses were calculated by the GENII model. The GENII model calculates radionuclide doses considering many exposure pathways. The inputs and defaults used in the GENII modeling should be summarized and referenced.

Section E-3.3.2.2, page E-3-17

In the modeling of the baseline impacts, some sources were grouped together and modeled as area or volume sources. The general assumptions used to justify these groupings should be included in the EIS so that the reviewer can determine if such groupings are appropriate.

Section E-3.3.2.4, page E-3-24

The EIS should state whether or not off-site radionuclide doses were modeled using the same methodology as the on-site doses.

Section E-3.3.3, page E-3-26

Please clarify how both carcinogenic and non-carcinogenic toxic air pollutants were evaluated. This section leads the reader to believe carcinogenic and non-carcinogenic toxic air pollutants were only evaluated on an annual basis and compared to annual standards. Other sections of the EIS clearly state that the applicable standards for non-carcinogens are the 24-hour ambient levels and annual